

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PRAGMATUS TELECOM, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 12-1534 (RGA)
)	
ALCATEL-LUCENT USA INC.,)	
)	
Defendant.)	

**DEFENDANT ALCATEL-LUCENT USA INC.'S MOTION TO STAY
PENDING THE REEXAMINATION OF THE '231 AND '286 PATENTS**

Defendant Alcatel-Lucent USA Inc. ("Alcatel-Lucent") moves to stay this case pending the *ex-parte* reexamination of U.S. Patent No. 6,311,231 (Control No. 90/012,617) and the *inter partes* reexamination of U.S. Patent No. 6,668,286 (Control No. 95/002,317). Alcatel-Lucent joins in and incorporates the grounds for this motion as set forth by defendant HSN, Inc. in its motion and brief in support of a stay pending the outcome of the U.S. Patent and Trademark Office's reexamination of the '231 and '286 patents in C.A. No. 12-1546 (RGA) (D.I. 10).

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February 11, 2013
6996028

7.1.1 CERTIFICATION

I hereby certify that the subject of the foregoing motion has been discussed with counsel for the plaintiff and that we have not been able to reach agreement.

/s/ Paul Saindon

Paul Saindon (#5110)

CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on February 11, 2013, upon the following in the manner indicated:

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